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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE UKG INC CYBERSECURITY  
LITIGATION

THIS DOCUMENT RELATES TO:

All Actions.

Case No.: 3:22-cv-00346-SI

**DECLARATION OF KAS L. GALLUCCI IN  
SUPPORT OF PLAINTIFFS' MOTION  
FOR FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT**

**Date: November 17, 2023**

**Time: 10:00 a.m.**

**Dept.: Courtroom 1, 17th Floor**

**Judge: Honorable Susan Illston**

1 I, Kas L. Gallucci, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

2 1. I am counsel of record for Plaintiff Adam Bente. I, along with my colleague Alexis  
3 M. Wood, and my co-counsel at Wucetich & Korovilas LLP, Alexander Morrison + Fehr LLP, and  
4 Lebe Law APLC, represent Plaintiffs William Muller, Antonio Knezevich, Adam Bente, and Cindy  
5 Villanueva (collectively “Plaintiffs”). I am an attorney at law licensed to practice in the State of  
6 California, and I am a member of the bar in this Court. I have personal knowledge of the facts set  
7 forth in this declaration and, if called as a witness, I could and would testify competently thereto.

8 2. I submit this supplemental declaration in support of Plaintiffs’ Motion for Final  
9 Approval of Class Action Settlement.

10 **UPDATED INFORMATION RE: WORK PERFORMED AND LODESTAR**

11 3. Since the filing of the Motion for Attorneys’ Fees on August 14, 2023, I and my  
12 colleague Alexis M. Wood have performed additional work on this case. This work has consisted  
13 of: (1) reviewing and responding to emails from the Settlement Administrator and counsel for the  
14 parties regarding notice efforts and responses from class members; (2) participating in phone calls  
15 and email exchanges with the Settlement Administrator and counsel to discuss ways to increase  
16 class member participation in the Settlement; (3) negotiating, drafting, reviewing and approving the  
17 language in reminder notices which were sent to the Exfiltration Subclass Members and known  
18 Settlement Class Members; (4) confirming the accuracy of the Settlement Website, (5)  
19 communicating directly with Settlement Class Members via both telephone and email  
20 communications; (6) working with the Settlement Administrator on the claims review process; and  
21 (7) working on the final approval motion.

22 4. Alexis Wood and I have been actively involved in overseeing the notice and claims  
23 review process to maximize participation in the Settlement, and have not duplicated work.

5. As of the filing of this declaration, my firm's updated lodestar is as follows:

Timekeeper	Position	Year	Rate Requested	Total Hours	Total Amount
Alexis M. Wood	Senior Associate	2010	\$645.00	346.8 (additional 21.4 hours)	\$223,686.00
Kas L. Gallucci	Senior Associate	2013	\$605.00	305 (additional 32.5 hours)	\$184,525.00
				<b>TOTAL:</b>	<b>\$408,211.00</b>

6. Between now and the final approval hearing, we expect to incur an additional 5-10 hours each of work overseeing the claims review process and deficiency/cure process, preparing updated declarations for final approval and preparing for the hearing.

7. As of the date of this filing, my firm has incurred an additional \$30 in expenses for Deadlines.com fees. Thus, at present my firm's total expenses are: \$7,518.73.

I declare under penalty of perjury that the above and foregoing is true and accurate.  
Executed this 17<sup>th</sup> day of October, 2023, at San Diego CA.

/s/ Kas L. Gallucci

Kas L. Gallucci